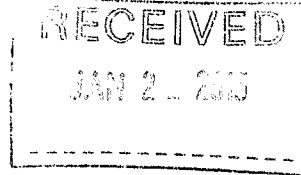




BAKERSFIELD REFINERY

December 22, 2014

United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901
Attention: Mr. David Albright - Drinking Water Protection Section



Certified Mail

7009 2250 0001 6586 5718

**Subject: UIC Permit Application for Class I Injection Wells, R9UIC CA1 FY 11-2
NOD Response Schedule**

Dear Mr. Albright:

Alon Bakersfield Refinery is providing the following schedule for tasks requested by the EPA (Region IX) Notice of Deficiency (NOD) for the Alon Refinery UIC Permit Application for Class I Wells, R9UIC-CA1-FY11-2.

The tasks requested are divided into two phases; each phase and the timing are described below.

- Phase I: January 2015.
 - Revise Area of Review (AOR) pressure front calculations to include current formation pressure, update waste front calculations to include volumes injected since 2010.
- Phase II: January through May 2015, update the permit application to include the following:
 - Update maps with new AOR to the standards requested by the NOD.
 - Update Table 1; listing the wells and well information for all wells within the newly defined AOR.
 - Evaluate Red Ribbon 7, prepare a schedule to evaluate the wells' potential value, and/or prepare a plugging and abandonment plan.
 - Update information on the existing and proposed injection wells; revise the proposed well bore diagrams to include the requested additional annotation.
 - Update well bore diagrams to include new wells, plus re-drilled or re-worked or abandoned well information.
 - Review the aquifer exemption application requirements, discuss with EPA, prepare a Class I aquifer exemption application (if necessary) for existing and proposed injection wells.
 - Update plugging and abandonment plans to include cement plugs at the base of the USDW and label diagrams as required by EPA.
 - Reconcile and correct step rate test text, add fracture gradient.

Please direct any questions or comments to me at 661-326-4422 or email helen.ordway@AlonUSA.com.

Sincerely,

Helen Ordway
Environmental Manager

File: 780,830
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